

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



February 21, 2025

CA2024-1206

Ross Johnson  
AT&T Director of Regulatory Relations  
430 Bush Street, 5th Floor  
San Francisco, CA 94108

**SUBJECT:** Audit of AT&T Valley Construction District

Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Jose Lastra of my staff conducted a Communication Infrastructure Provider (CIP) audit of AT&T's Valley Construction District from August 19-23, 2024. The audit included a review of AT&T's inspection and maintenance records and a field inspection of AT&T's communication facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than March 21, 2025, by electronic or hard copy, of all corrective measures taken by AT&T to remedy and prevent such violations.

Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you also provide us with a public or redacted version of your response that can be posted publicly on our website.

If you have any questions concerning this audit, you can contact Jose Lastra at (213) 507-1438 or [jose.lastra@cpuc.ca.gov](mailto:jose.lastra@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Fadi Daye".

Fadi Daye, P.E.  
Program and Project Supervisor  
Electric Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission

Enclosures: CPUC Audit Findings

Cc: Leslie Palmer, Director, Safety and Enforcement Division, CPUC  
Derek Fong, Senior Utilities Engineer, ESRB, SED, CPUC  
Jose Lastra, Utilities Engineer, ESRB, SED, CPUC

## AUDIT FINDINGS

### I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspection records
- Patrol records
- Completed and pending corrective action work orders
- Safety hazard notifications
- Pole-loading calculations
- AT&T's documented inspection program

### II. Records Review – Violations List

My staff observed the following violations during the records review portion of the audit:

**GO 95, Rule 80.1-A2, Statewide Inspection Requirements**, states in part:

*Each company shall prepare, follow, and modify as necessary, procedures for conducting patrol or detailed inspections for all of its Communication Lines throughout the State.*

**GO 95, Rule 31.2, Inspection of Lines**, states in part:

*Lines shall be inspected frequently and thoroughly for the purpose of ensuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard.*

AT&T's records indicated that from June 1, 2020 to June 31, 2024, AT&T completed 1 overhead patrol inspection past AT&T's scheduled due date.

**GO 95, Rule 18-B1, Maintenance Programs**, states in part:

*Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below. Scheduling of corrective actions within the time periods below may be based on additional factors, including the following factors, as appropriate ...*

**GO 95, Rule 31.1, Design, Construction and Maintenance**, states in part:

*For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of communication or supply lines and equipment.*

AT&T's records indicated that from June 1, 2020 to June 31, 2024, AT&T completed 182 overhead work orders past AT&T's due date for corrective action. Additionally, as of the date of the audit, AT&T had 480 open overhead work orders that were past AT&T's scheduled due date for corrective action.

**GO 95, Rule 31.1, Design Construction and Maintenance**, states in part:

*Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.*

The pole loading calculation for Pole 4590817E showed a span length in the northern direction leading to Pole 4760735E as 180 feet, however, the field measurement was 157 feet.

### III. Field Inspection

My staff inspected the following structures during the field inspection portion of the audit:

No.	Structure ID	Structure Type	Location
1	122113572	Wood Pole	Bakersfield
2	110347438	Wood Pole	Bakersfield
3	121127330	Wood Pole	Bakersfield
4	110347437	Wood Pole	Bakersfield
5	743 Mesa Dr, NW side of property	Wood Pole	Bakersfield
6	743 Mesa Dr, S side of property	Wood Pole	Bakersfield
7	6613	Wood Pole	Bakersfield
8	737 Mesa Dr	Wood Pole	Bakersfield
9	122113574	Wood Pole	Bakersfield
10	6615	Wood Pole	Bakersfield
11	705 Mesa Dr	Wood Pole	Bakersfield
12	701 Mesa Dr, N side of property	Wood Pole	Bakersfield
13	701 Mesa Dr, S side of property	Wood Pole	Bakersfield
14	121006784	Wood Pole	Bakersfield
15	3504 Pioneer Dr	Wood Pole	Bakersfield
16	4742715E	Wood Pole	Tehachapi
17	1769362E	Wood Pole	Tehachapi
18	1769361E	Wood Pole	Tehachapi
19	1769360E	Wood Pole	Tehachapi
20	1769359E	Wood Pole	Tehachapi
21	1786700E	Wood Pole	Tehachapi
22	20824 Brentwood Dr	Wood Pole	Tehachapi
23	1786698E	Wood Pole	Tehachapi
24	1786697E	Wood Pole	Tehachapi
25	4587110E	Wood Pole	Tehachapi
26	2320902E	Wood Pole	Tehachapi
27	1786699E	Wood Pole	Tehachapi
28	1897172E	Wood Pole	Tehachapi
29	4179953E	Wood Pole	Tehachapi
30	2058898E	Wood Pole	Tehachapi
31	1769364E	Wood Pole	Tehachapi
32	4590817E	Wood Pole	Keene
33	4590818E	Wood Pole	Keene
34	4698710E	Wood Pole	Keene
35	1403582E	Wood Pole	Keene
36	1355556E	Wood Pole	Keene
37	1355555E	Wood Pole	Keene
38	122239102	Wood Pole	Arvin
39	120350076	Wood Pole	Arvin
40	846 Haven Dr	Wood Pole	Arvin
41	433 Grove St	Wood Pole	Arvin

42	121446833	Wood Pole	Arvin
43	121720401	Wood Pole	Arvin
44	924 Haven Dr	Wood Pole	Arvin
45	908 Haven Dr	Wood Pole	Arvin
46	122239111	Wood Pole	Arvin
47	1032 Haven Dr	Wood Pole	Arvin
48	1040 Haven Dr	Wood Pole	Arvin
49	122239113	Wood Pole	Arvin
50	441 Monroe St	Wood Pole	Arvin
51	1112 Haven Dr	Wood Pole	Arvin
52	122238991	Wood Pole	Arvin
53	437 Walnut Dr	Wood Pole	Arvin
54	525 Walnut Dr	Wood Pole	Arvin
55	541 Walnut Dr	Wood Pole	Arvin
56	306 Terra Vista Ln, E side of property	Wood Pole	Shafter
57	306 Terra Vista Ln, W side of property	Wood Pole	Shafter
58	312 Terra Vista Ln, Rear of Property	Wood Pole	Shafter
59	330 Terra Vista Ln, Rear of Property	Wood Pole	Shafter
60	315 Ann Ave, Rear of Property	Wood Pole	Shafter
61	333 Ann Ave, Rear of Property	Wood Pole	Shafter
62	348 Terra Vista Ln	Wood Pole	Shafter
63	121163624	Wood Pole	Shafter
64	360 Terra Vista Ln	Wood Pole	Shafter
65	351 Ann Ave, Rear of Property	Wood Pole	Shafter
66	121432712	Wood Pole	Shafter
67	400 W Ash Ave, NE side of property	Wood Pole	Shafter
68	378 Terra Vista Ln, W side of property	Wood Pole	Shafter
69	1076	Wood Pole	Shafter
70	400 Curtis Ave, S side of property	Wood Pole	Shafter
71	122084067	Wood Pole	Shafter
72	122084068	Wood Pole	Shafter
73	122084063	Wood Pole	Shafter
74	473 W Euclid Ave	Wood Pole	Shafter
75	487 W Euclid Ave	Wood Pole	Shafter
76	493 W Euclid Ave	Wood Pole	Shafter
77	456 W Ash Ave, N side of property	Wood Pole	Shafter
78	121135025	Wood Pole	Shafter
79	432 W Ash Ave, N side of property	Wood Pole	Shafter
80	414 W Ash Ave, N side of property	Wood Pole	Shafter

81	400 W Ash Ave, NW side of property	Wood Pole	Shafter
82	120389008	Wood Pole	Bakersfield
83	120389014	Wood Pole	Bakersfield
84	120389023	Wood Pole	Bakersfield
85	120388986	Wood Pole	Bakersfield
86	120388999	Wood Pole	Bakersfield
87	120388987	Wood Pole	Bakersfield
88	120388985	Wood Pole	Bakersfield
89	120388975	Wood Pole	Bakersfield
90	120388973	Wood Pole	Bakersfield
91	120388952	Wood Pole	Bakersfield
92	120388921	Wood Pole	Bakersfield
93	120388922	Wood Pole	Bakersfield
94	120388923	Wood Pole	Bakersfield
95	T St, near 431 4th St	Wood Pole	Bakersfield
96	12500 Willowdale Dr	Pedestal	Bakersfield
97	12606 Willowdale Dr	Pedestal	Bakersfield
98	12704 Willowdale Dr	Pedestal	Bakersfield
99	12718 Stablegate Dr	Pedestal	Bakersfield
100	12616 Stablegate Dr	Pedestal	Bakersfield
101	12502 Stablegate Dr	Pedestal	Bakersfield
102	12506 High Country Dr	Pedestal	Bakersfield
103	12608 High Country Dr	Pedestal	Bakersfield
104	12714 High Country Dr	Pedestal	Bakersfield
105	2200 Mountain Oak	Pedestal	Bakersfield
106	2417 Gambel Oak Way	Pedestal	Bakersfield
107	2112 Gambel Oak Way	Pedestal	Bakersfield
108	2108 Gambel Oak Way	Pedestal	Bakersfield
109	2100 Gambel Oak Way	Pedestal	Bakersfield
110	9400 High Oak Dr	Pedestal	Bakersfield
111	9508 High Oak Dr	Pedestal	Bakersfield
112	2100 Mountain Oak Rd	Pedestal	Bakersfield

#### **IV. Field Inspection – Violations List**

My staff observed the following violations during the field inspections:

**GO 95, Rule 31.1, Design, Construction, and Maintenance**, states in part:

*Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.*

The AT&T facilities on each of the following poles were not maintained for their intended use:

- 1786700E – AT&T had a damaged lashing wire.
- 2320902E – AT&T had a vertical run of cable going down the pole that was unsecured
- 4590817E – AT&T had a damaged down guy marker
- 121432712 – AT&T had a damaged lashing wire.
- 120389008 – an AT&T terminal box was open and had a bird nest protruding out of it
- 120388986 – an AT&T pole mount terminal box was left open and unsecured
- 120388921 – an AT&T pole mount terminal box was left open and unsecured
- T St, near 431 4th St – AT&T had a rope tied to the pole steps, supporting equipment

**GO 95, Rule 31.6, Abandoned Lines**, states:

*Lines or portions of lines permanently abandoned shall be removed by their owners so that such lines shall not become a public nuisance or a hazard to life or property. For the purposes of this rule, lines that are permanently abandoned shall be defined as those lines that are determined by their owner to have no foreseeable future use.*

AT&T lines attached to each of the following poles were permanently abandoned:

- 122113574 – an AT&T service line was cut and left hanging low to the ground
- 6615 – an AT&T service line was hanging from the pole and wrapped around fence
- 705 Mesa Dr – an AT&T service line was abandoned and wrapped around a nearby tree
- 846 Haven Dr – an AT&T service line was abandoned and wrapped around a nearby fence
- 1032 Haven Dr – an AT&T service line was abandoned and tied to a nearby fence
- 122238991 – an AT&T service line was disconnected and hanging around the pole
- 122084068 – an AT&T service line was disconnected and left at the base of the pole.
- 432 W Ash Ave, N side rear of property – an AT&T service line was disconnected and wrapped around the pole
- 120388986 – an AT&T service line was disconnected and hanging around the pole low to the ground

**GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 8** requires the minimum vertical clearance of “Communication Conductors (Including Open Wire, Cables and Service Drops)” from “Communication Conductors and Supply Drops” supported on the same pole to be 12 inches.

The AT&T facilities on each of the following poles had less than 12 inches of vertical clearance from a communications conductor supported on the same pole:

- 737 Mesa Dr: AT&T service drops were touching a third-party communications conductor.
- 122113574: an AT&T service drop was contacting a third-party communications service drop.
- 1769361E: an AT&T service drop was contacting a third-party communications service drop with the use of a zip tie.
- 1769360E: an AT&T communications conductor was entangled with a third-party communications service drop.
- 1786700E: an AT&T communications conductor was contacting a third-party communications service drop.
- 400 W Ash Ave, NE side of property: an AT&T communications conductor was entangled with a third-party communications conductor.
- 378 Terra Vista Ln, W side of property: an AT&T service drop was contacting a third-party communications service drop.
- 122084067: an AT&T service drop was contacting a supply service drop near the home.
- 493 W Euclid Ave: an AT&T service drop was contacting a third-party communications service drop.
- 400 W Ash Ave, NW side of property: an AT&T service drop was contacting a third-party communications service drop.
- 120388986: an AT&T communications conductor was contacting a third-party service drop midspan
- 120388999: an AT&T service drop was contacting a third-party communications service drop.
- 120388923: an AT&T communications conductor was contacting a third-party communications service drop.

**GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 19** requires the minimum radial clearance between guys and span wires passing communication conductors supported on the same poles to be three inches.

The AT&T facilities on each of the following poles had less than 3 inches of radial clearance from a guy wire or span wire supported on the same pole:

- Pole 4590818E: an AT&T communications conductor was touching a down guy wire supported on the same pole.
- Pole 1355556E: an AT&T communications conductor was touching a span guy wire supported on the same pole.
- Pole 121446833: an AT&T service drop was wrapped around a down guy wire supported on the same pole.



**GO 95, Rule 38: Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 3** requires the minimum vertical clearance of “Communication Conductors (Including Open Wire, Cables and Service Drops)” from “Communication Conductors and Supply Drops” not supported on the same pole to be 24 inches.

The AT&T facilities on each of the following poles had less than 24 inches of vertical clearance from third-party communications conductors not supported on the same pole:

- Pole located at 701 Mesa Dr, S side of the property: an AT&T communications conductor span was contacting a third-party communications conductor span not supported on the same pole.
- Pole located at 433 Grove St: an AT&T communications conductor span was contacting a third-party communications conductor span not supported on the same pole.
- Pole located at 437 Walnut Dr: an AT&T communications conductor span was contacting a third-party communications conductor span not supported on the same pole.

**GO 95, Rule 54.6-B, Ground Wires**, states in part:

*That portion of the ground wires attached on the face or back of wood crossarms or on the surface of wood poles and structures shall be covered by a suitable protective covering (see Rule 22.8).*

The ground moulding attached to each of the following poles was missing/damaged:

- 743 Mesa Dr, S side of property
- 701 Mesa Dr, N side of property
- 4590817E
- 306 Terra Vista Ln, W side of property
- 493 W Euclid Ave

**GO 95, Rule 84.7-A, Climbing Space**, states in part:

*Climbing space shall be maintained on one side or quadrant of all poles or structures supporting communications conductors excepting at the level of the one pair of conductors attached to the pole below the lowest crossarm (Rules 84.4–C1c, 84.4–D1 and 87.4–C3) and the top 3 feet of poles carrying communication conductors only which are attached directly to pole in accordance with the provisions of Rule 84.4–C1c.*

The climbing space on Pole No. 2320902E was obstructed by service drops wrapped around the pole.

**GO 95, Rule 84.8-C3(b), Service Drops, Clearances above Ground and Buildings, Above Ground in Areas Accessible to Pedestrians Only, Residential Premises** states in part:

*Over areas accessible to pedestrians only, the vertical clearance shall not be less than 10 feet. EXCEPTION: If the building served does not permit an attachment which will provide this 10 foot clearance without the installation of a structure on the building, the clearance shall be as great as possible but in no case less than 8 feet 6 inches.*

AT&T communications service drops supported on each of the following poles had less than the minimum required vertical clearance in a pedestrian accessible area:

- Pole 120388999: an AT&T communications service drop servicing a home across the street had an above ground vertical clearance of less than 8 feet, 6 inches.
- Pole 120388987: an AT&T communications service drop servicing a home across the street had an above ground vertical clearance of less than 8 feet, 6 inches.
- Pole 120388923: an AT&T communications service drop servicing a home across the street had an above ground vertical clearance of less than 8 feet, 6 inches.

**GO 95, Rule 84.8-C4, Service Drops, Clearances above Ground and Buildings, From Buildings and Structures** states in part:

*Service drops are not required to clear the roofs of buildings on the premises served any specified vertical distance. The vertical clearance above buildings on premises other than the one being served shall not be less than 8 feet, except that a reduction to not less than 2 feet is permitted under either of the following conditions.*

AT&T communications service drops supported on each of the following poles had less than the minimum required clearance from the roof of a building on the premises served:

- Pole located at 743 Mesa Dr, S side of the property: an AT&T service drop was contacting the roof of the home it was servicing.
- Pole located at 705 Mesa Dr: an AT&T service drop was contacting the roof of the home it was servicing.
- Pole located at 1032 Haven Dr: an AT&T service drop was contacting the roof of the home it was servicing.
- Pole 122084063: an AT&T service drop was contacting the roof of a greenhouse/tent at the property it was servicing.

**GO 95, Rule 91.3 Stepping, B. Location of Steps,** states in part:

*The lowest step shall be not less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain. Steps or fixtures for temporary steps shall be installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the steps.*

The lowest pole step on the pole on T St, near 431 4th St, was less than eight feet from the groundline.

**GO 128, Rule 17.1, Design Construction and Maintenance,** states in part:

*Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.*

The pedestal in front of 9400 High Oak Dr in Bakersfield, CA had a significant hole along its base, large enough for small animals or unauthorized entry.